

Boris Avramski, Esq.
Nevada Bar No. 11350
MARATHON LAW GROUP, PLLC
2012 Hamilton Lane
Las Vegas, NV 89106
Tel.: 702-522-1808
Fax: 702-685-3625
Email: Boris@marathonlawgroup.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MISAEEL RAMOS an individual,

Plaintiff

vs.

STEVEN THOMPSON, an individual; C.
BECK, an individual; LAS VEGAS
METROPOLITAN POLICE DEPARTMENT,
a political subdivision on the State of Nevada;
DOES II through X, inclusive; and ROE
CORPORATIONS I through X, inclusive,

Defendants

Case No.: 2:24-cv-02128-CDS-NJK

**STIPULATION AND ORDER TO
WITHDRAW AND STRIKE
PLAINTIFF'S RESPONSE TO LVMPD
DEFENDANTS' MOTION TO DISMISS
AND MODIFY BRIEFING SCHEDULE**

(SECOND REQUEST)

[ECF No. 12]

Plaintiff, Misael Ramos, through his attorney of record Boris Avramski, Esq., from MARATHON LAW GROUP, PLLC, and Defendants, Las Vegas Metropolitan Police Department ("LVMPD"), Caroline Beck (sued as "C. Beck"), and Steven Thompson (collectively "LVMPD Defendants"), through their counsel, Kaempfer Crowell, hereby stipulate and agree to Plaintiff withdrawing his *RESPONSE TO LVMPD DEFENDANTS' MOTION TO DISMISS* [ECF No. 11] and modify the briefing schedule on *LVMPD DEFENDANTS' MOTION TO DISMISS* [ECF No. 4].

Recently discovered information mandates that Plaintiff make changes to the factual allegations in his Proposed Amended Complaint attached as Exhibit 1 to *PLAINTIFF'S RESPONSE TO LVMPD DEFENDANTS' MOTION TO DISMISS* [ECF No. 11].

Therefore, the Parties hereby stipulate and agree that *PLAINTIFF'S RESPONSE TO*

1 *LVMPD DEFENDANTS' MOTION TO DISMISS* [ECF No. 11] is hereby withdrawn and shall be
2 stricken from the record.

3 The Parties further stipulate and agree that Plaintiff shall file a response to *LVMPD*
4 *DEFENDANTS' MOTION TO DISMISS* [ECF No. 4] by December 20, 2024.

5 The Parties further stipulate and agree that the LVMPD Defendants' deadline to file a reply
6 to Plaintiff's response shall be January 2, 2024.

7 This is the Parties' second request to change the briefing schedule on *LVMPD*
8 *DEFENDANTS' MOTION TO DISMISS*.

9
10 DATED this 16th day of December 2024.

11 MARATHON LAW GROUP, PLLC

12 /s/ Boris Avramski
13 Boris Avramski, Esq.
14 Nevada Bar No. 11350
15 MARATHON LAW GROUP, PLLC
16 2012 Hamilton Lane
17 Las Vegas, NV 89106
18 Tel.: 702-522-1808
19 Fax: 702-685-3625
20 Email: Boris@marathonlawgroup.com
21 *Attorney for Plaintiff*

DATED this 16th day of December 2024.

KAEMPFER CROWELL

12 /s/Kristopher Kalkowski
13 LYSSA S. ANDERSON
14 Nevada Bar No. 5781
15 KRISTOPHER J. KALKOWSKI
16 Nevada Bar No. 14892
17 KAEMPFER CROWELL
18 1980 Festival Plaza Drive, Suite 650
19 Las Vegas, Nevada 89135
20 Telephone: (702) 792-7000
21 Fax: (702) 796-7181
22 landerson@kcnvlaw.com
23 kkalkowski@kcnvlaw.com
24 *Attorneys for Defendants*
25 *Caroline Beck, Steven Thompson, and*
26 *Las Vegas Metropolitan Police Department*

20 **ORDER**

21 Based on the parties' stipulation, plaintiff's response to defendants' motion to dismiss
22 **[ECF No. 11] is withdrawn and stricken**. The deadline for plaintiff to file a response is
23 extended to December 20, 2024, with the defendants' reply due on January 2, 2025.

24 December 19, 2024

25
26 
27 **UNITED STATES DISTRICT JUDGE**